

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23
)	

Comments of the Washington State Access to Justice Board

The Washington State Access to Justice Board respectfully submits these comments in response to the Commission's Further Notice of Proposed Rulemaking (FNPRM), released on February 6, 2012.

The Washington State Access to Justice (ATJ) Board was established by order of the Washington Supreme Court in 1994. Our members include lawyers, judges, court administrators, legal service providers, technology experts, educators, and representatives of recipient communities. The goal of the ATJ Board is to promote equal and meaningful access to justice, and we have long recognized the importance of the Internet in removing barriers to such access. Our Technology Committee is responsible for the ATJ Technology Principles, which were adopted in December 2004 by order of the Washington State Supreme Court. The Principles guide and inform our comments here. The Principles are available online at <http://www.atjweb.org/read-the-principles/>. The Supreme Court order adopting the Principles is available online at <http://www.atjweb.org/supreme-court-order/>.

We are part of the Washington State *JusticeNet*, a statewide collaborative effort that aims, in part, to bring ready access to the justice system via Internet-connected libraries, community centers, courthouses, and other public and private organizations. A full list of *JusticeNet* members is available at <http://www.atjweb.org/projects/>. The ATJ Board is also a participant in the EdLab Group's Communities Connect Network Project, which has received a BTOP grant to provide public computing centers in Washington State courthouses, and digital literacy training focused on accessing online legal and judicial information, resources, and services.

The ATJ Board supports and applauds the Commission's proposal to expand universal service to

include broadband and to support digital literacy training (DLT) programs. Broadband has become an essential service; it is now a de facto requirement for jobs, education, health, exercising one's legal rights, and engaging in civic participation. Those without sufficient access or the skills to use the Internet effectively are at a significant disadvantage. To help ensure that the FCC meets its goal of furthering broadband adoption and training, we would like to take this opportunity to comment on certain features of the proposed pilot program.

Our comments revolve around these points:

- Digital literacy is a necessary prerequisite for broadband adoption and use, and must be promoted alongside and simultaneously with infrastructural expansion.
- The FCC should broaden its support for broadband adoption and digital literacy training programs; existing digital literacy training providers should be eligible for new grants, and organizations besides schools and libraries should be considered.
- The FCC should base overall and organization-specific funding levels for digital literacy training on the demonstrable costs of creating and sustaining training programs. Rather than mandating a particular form of training, organizations should be allowed to tailor their programs to local needs and conditions.
- A sustainable program to increase broadband access and digital literacy training will likely require additional funding, as well as incentives for the creation of multi-stakeholder partnerships.

We are aware the Washington State Council on Digital Inclusion, in association with Communities Connect Network, has submitted more detailed comments with respect to program implementation. We endorse those comments and hope that the Commission will consider them carefully.

Digital Literacy Is a Prerequisite for True Broadband “Availability”

In ¶ 416, the FCC notes that the “availability” of broadband requires three factors: actual deployment, adequate robustness, and affordability. We would like to suggest a fourth required factor: consumer knowledge. As has been noted in other comments, adoption of broadband services, particularly in lower income homes, will not occur unless these households already know what broadband can offer, and how to use it. Widespread digital literacy training programs can provide that knowledge, increasing the likelihood that unconnected homes and individuals will take advantage of increased deployment of broadband services.

As noted in ¶ 418, “Americans who lack the skills to use broadband simply do not have the same access to services and information as other consumers.” Somewhat recursively, those “services and information” include broadband itself. Access to broadband is meaningful only if users are able to properly use it.

The FCC Should Allow Existing Digital Literacy Training Programs to Receive New Funds, and Should Expand the Class of Eligible Recipients

Expanding the Class of Eligible Organizations Furthers the Goals of Equal and Universal Access, Maximization of Public Awareness and Use, and the Establishment of Best Practices

The ATJ Board has long supported the principled use and proliferation of technology as an inclusive and empowering force, leading to the creation of the ATJ Technology Principles, adopted in 2004 by order of the Washington State Supreme Court, as authoritative guidelines for the use of technology in the justice system. The Principles and the Supreme Court Order are attached as appendices below. Applying these Principles here, we recommend that funds should be directed in a manner that:

1. Enhances **access** to broadband services,
2. Maximizes **public awareness and use**, and
3. Promotes the creation of, and adherence to, **best practices** guidelines.

Although we agree that eligibility criteria should exist for digital literacy training funding, we disagree with the criteria proposed in ¶ 430. We are particularly concerned with the exclusion of entities that already offer digital literacy training programs and the focus only on schools and libraries. Although ¶ 432 considers expanding eligibility in the event that surplus funding is available, we believe that fundamental considerations weigh strongly in favor of allowing pre-existing programs, and a broader class of eligible organizations in general, to be funded from the outset.

Schools and Libraries Should Not Be the Only Organizations Funded for Digital Literacy Training

Schools and libraries are critical anchor institutions for DLT programs; however, they are not the only, nor are they always the most favorable, locations. Some other institutions to consider are:

- Non-profit groups who may partner with senior/assisted living homes or other places;
- Other organizations that provide multiple community services, such as the YMCA, YWCA and similar organizations;
- Job centers, disability service providers, private community centers, ethnic community centers, and senior centers that may be run by non-profit groups or local governments;
- Local governmental and administrative centers, such as courthouses and public community centers;
- Low-income housing centers offering complementary social and education services;

- Community-based health-care and legal service centers that also provide essential services.

Some of these institutions already provide digital literacy training services and should be included in the pool of eligible grant applicants. An inclusive approach is the best means of leveraging the local expertise and resources a given community can provide. In sum, funding should be awarded based on the quality of proposed training programs and an appraisal of the candidate organization's ability to fulfill its plans. The nature of a candidate institution should not be a primary consideration.

In order to best serve those populations for whom digital literacy training is most essential, it is important that the eligibility for funds is determined in a manner that increases, rather than limits, the options and expertise available to individual communities.

Organizations With Existing Digital Literacy Training Programs Should Not Be Excluded from Receiving New Grants

The primary goal of any effort to support and develop digital literacy training programs should be to maximize the benefits to the end users of such training. As such, it is crucial that institutional knowledge and experience, such as that possessed by organizations currently providing DLT services, be preserved and developed into a set of best practices available to all DLT providers.

Existing digital literacy training programs embody a great deal of knowledge and experience that new programs would necessarily lack. Such knowledge and experience must be preserved and built upon in order to create tested and effective best practices guidelines. Denying these pre-existing groups access to new funds would risk destroying the knowledge and experience they, and only they, possess; this would significantly retard the growth and development of DLT programs nationwide.

New entrants should be encouraged to partner with existing providers. Limiting grantees to only new entrants might have the negative effect of impeding existing providers from reaching new community members, by preventing them from expanding the number of locations they serve, the population targeted (e.g., programs in a new language or for the disabled), or hours of availability.

Financial and Administrative Considerations

Funding Should be Increased and Matching Requirements Decreased

We urge the FCC to consider increasing the amount of funding available to digital literacy training initiatives. There are a number of elements to a successful digital literacy training program, and a \$10,500 grant will likely be insufficient to cover the needs of training providers,

particularly new entrants. In addition to the costs the Commission contemplates, providers must budget for a variety of expenses:

- Equipment and technical support, including the purchase, maintenance, and replacement of software and hardware, including assistive technology for users with disabilities
- Program development and evaluation expenses, including the costs of maintaining records, writing reports, and retaining consultants with relevant knowledge
- Staff and volunteer training and development
- Transportation and/or outreach costs

Although the size and availability of grants are a more immediate concern, we would also like to recommend that recipient organizations be allowed to use funds in the manner they determine best suited to maximizing the benefits of DLT for their individual communities. Local knowledge of the composition and demographics of underserved populations is the most effective guide to the optimal use of grant funds.

Matching requirements also pose an obstacle to smaller or underfunded organizations. We propose that matching requirements be limited to 25% of received grants, and that “in-kind” matching, such as donations of time or equipment, be allowed.

The Commission Should Consider the Characteristics of Long-Term, Sustainable Digital Literacy Training Efforts

Sustainable and long-term efforts to provide widespread broadband access and digital literacy training for disadvantaged and vulnerable populations will require the participation of a wide spectrum of groups and a variety of funding mechanisms.

We recommend that the Commission:

1. Encourage and institutionalize an environment of cooperation and collaboration by incentivizing multi-stakeholder partnerships now;
2. Support partnerships between public, non-profit, and commercial organizations;
3. Examine other potential, sustainable, FCC funding mechanisms;
4. Enable and encourage state and local governments to negotiate collaboration, partnership and franchise terms which support digital literacy and access goals;
5. Support state and federal Councils on Digital Inclusion, similar to Washington state’s CODI, in order to continue coordination, development and sharing of best practices in broadband adoption, digital literacy and access.

The comments of the Washington State Council on Digital Inclusion discuss, with particularity, many recommendations that would help the Commission sustain digital literacy training beyond the time period contemplated in the FNPRM.

Conclusion

The Access to Justice Board greatly appreciates the opportunity to participate in the Commission’s deliberations. We would like to reiterate our support for the Commission’s proposed activities, and will be happy to discuss any of our comments in more detail, or provide additional information, as we all work toward the goal of truly universal broadband availability, which will inevitably lead to greater inclusiveness, fairness, and quality of life for all.

In the interests of clarity and ease of reference, we present this tabulated summary of our comments, indexed to the corresponding paragraphs in the FNPRM:

Question Posed	Recommendation
What types of entities should be eligible to receive digital literacy training funds? (§ 428)	Community based non-profit and local governments service providers should be eligible organizations, in addition to schools and libraries.
Should funds be limited to entities that do not already offer formal digital training services? (§ 430) Should there be a matching requirement and, if so, what should it be? (§ 440)	Funds should not be restricted in this manner. However, different criteria may be applied for groups new to digital training. Partnerships between experienced and novice groups should be encouraged, in order to ensure use of best practices and prevent having to re-invent curriculum and evaluation practices. A local match of 25% would be acceptable , though the FCC should consider a waiver for smaller or limited income groups to participate. “In-kind” matching, such as donations of time, services, and equipment should be recognized.
Should funds target specific groups? (§ 431)	Funds should not target specific groups; rather, local programs should be allowed to submit their own proposals to encourage diversity in the groups served.
Should we consider funding programs	<i>It would be best to keep an open program and track</i>

<p>focused on particular digital literacy skills, e.g., job searching, e-government services, or financial services? (¶ 432)</p>	<p><i>how these are applied.</i></p> <p>What is important is that projects involve an applied use of skills relevant to the needs of underserved populations. This varies by user and, as such, it should be left to DLT providers to determine what skills to teach, and how to teach them.</p> <p>There is, however, some fundamental knowledge that should be universally taught; consumer and legal education, computer and Internet safety, and basic issues of privacy and security should be addressed by all projects.</p>
<p>Would a \$15,000 annual program budget per entity be sufficient to support a digital literacy training program? Would that level of support allow eligible entities to provide meaningful training programs in the community? (¶ 440)</p>	<p>\$15,000/yr is enough only for a very limited part time program. We recommend an increase in support, based on the actual costs contemplated by grant applicants.</p>

APPENDIX 1

The Washington State Access to Justice Technology Principles

As Adopted by the Washington State Supreme Court, December 3, 2004

PREAMBLE

The use of technologies in the Washington State justice system must protect and advance the fundamental right of equal access to justice. There is a particular need to avoid creating or increasing barriers to access and to reduce or remove existing barriers for those who are or may be excluded or underserved, including those not represented by counsel.

This statement presumes a broad definition of access to justice, which includes the meaningful opportunity, directly or through other persons: (1) to assert a claim or defense and to create, enforce, modify, or discharge a legal obligation in any forum; (2) to acquire the procedural or other information necessary (a) to assert a claim or defense, or (b) to create, enforce, modify, or discharge an obligation in any forum, or (c) to otherwise improve the likelihood of a just result; (3) to participate in the conduct of proceedings as witness or juror; and (4) to acquire information about the activities of courts or other dispute resolution bodies. Further, access to justice requires a just process, which includes, among other things, timeliness and affordability. A just process also has “transparency,” which means that the system allows the public to see not just the outside but through to the inside of the justice system, its rules and standards, procedures and processes, and its other operational characteristics and patterns so as to evaluate all aspects of its operations, particularly its fairness, effectiveness, and efficiency.

Therefore, these Access to Justice Technology Principles state the governing values and principles which shall guide the use of technology in the Washington State justice system.

Comment to “Preamble”

Access to justice is a fundamental right in Washington State, and the State Supreme Court has recognized and endeavored to protect that right in its establishment of the Access to Justice Board. From an understanding that technology can affect access to justice, these Access to Justice Technology Principles are intended to provide general statements of broad applicability and a foundation for resolving specific issues as they arise. The various parts of this document should be read as a whole.

A broad definition of the terms used herein is necessary to ensure that our underlying constitutional and common law values are fully protected. The terms used in this document should be understood and interpreted in that light.

These Principles do not mandate new expenditures, create new causes of action, or repeal or modify any rule. Rather, they require that justice system decision makers consider access to justice, take certain steps whenever technology that may affect access to justice is planned or implemented, avoid reducing access, and, whenever possible, use technology to enhance access to justice.

SCOPE

The Access to Justice Technology Principles apply to all courts of law, all clerks of court and court administrators, and to all other persons or parts of the Washington justice system under the rule-making authority of the Court. They should also serve as a guide for all other actors in the Washington justice system.

“Other actors in the Washington justice system” means all governmental and non-governmental bodies engaged in formal dispute resolution or rulemaking and all persons and entities who may represent, assist, or provide information to persons who come before such bodies.

“Technology” includes all electronic means of communication and transmission and all mechanisms and means used for the production, storage, retrieval, aggregation, transmission, communication, dissemination, interpretation, presentation, or application of information.

Comment to “Scope”

This language is intended to make clear that the Access to Justice Technology Principles are mandatory only for those persons or bodies within the scope of the State Supreme Court’s rulemaking authority. It is, however, hoped and urged that these Principles and their values will be applied and used widely throughout the entire justice system.

It is also intended that the Access to Justice Technology Principles shall continue to apply fully in the event all or any portion of the performance, implementation, or accomplishment of a duty, obligation, responsibility, enterprise, or task is delegated, contracted, assigned, or transferred to another entity or person, public or private, to whom the Principles may not otherwise apply.

The definition of the word “technology” is meant to be inclusive rather than exclusive.

1. REQUIREMENT OF ACCESS TO JUSTICE

Access to a just result requires access to the justice system. Use of technology in the justice system should serve to promote equal access to justice and to promote the opportunity for equal participation in the justice system for all. Introduction of technology or changes in the use of technology must not reduce access or participation and, whenever possible, shall advance such access and participation.

Comment to “Requirement of Access to Justice”

This Principle combines promotion of access to justice through technology with a recognition of the “first, do no harm” precept. The intent is to promote the use of technology to advance access whenever possible, to maintain a focus on the feasible while protecting against derogation of access, and to encourage progress, innovation, and experimentation.

2. TECHNOLOGY AND JUST RESULTS

The overriding objective of the justice system is a just result achieved through a just process by impartial and well-informed decision makers. The justice system shall use and advance technology to achieve that objective and shall reject, minimize, or modify any use that reduces the likelihood of achieving that objective.

Comment to “Technology and Just Results”

The reference to a “just process” reaffirms that a just process is integral to a just result. The reference to “well-informed decision makers” is to emphasize the potential role of technology in gathering, organizing, and presenting information in order that the decision maker receives the optimal amount and quality of information so that the possibility of a just result is maximized.

3. OPENNESS AND PRIVACY

The justice system has the dual responsibility of being open to the public and protecting personal privacy. Its technology should be designed and used to meet both responsibilities.

Technology use may create or magnify conflict between values of openness and personal privacy. In such circumstances, decision makers must engage in a careful balancing process, considering both values and their underlying purposes, and should maximize beneficial effects while minimizing detrimental effects.

Comment to “Openness and Privacy”

This Principle underlines that the values of openness and privacy are not necessarily in conflict, particularly when technology is designed and used in a way that is crafted to best protect and, whenever possible, enhance each value. However, when a conflict is unavoidable, it is essential to consider the technology’s effects on both privacy and openness. The Principle requires that decision makers engage in a balancing process which carefully considers both values and their underlying rationales and objectives, weighs the technology’s potential effects, and proceed with use when they determine that the beneficial effects outweigh the detrimental effects.

The Principle applies both to the content of the justice system and its operations, as well as the requirements for accountability and transparency. These requirements may mean different things depending on whether technology use involves internal court operations or involves access to and use of the justice system by members of the public.

4. ASSURING A NEUTRAL FORUM

The existence of a neutral, accessible, and transparent forum for dispute resolution is fundamental to the Washington State justice system. Developments in technology may generate alternative dispute resolution systems that do not have these characteristics, but which, nevertheless, attract users who seek the advantages of available technology. Participants and actors in the Washington State justice system shall use all appropriate means to ensure the existence of neutral, accessible, and transparent forums which are compatible with new technologies and to discourage and reduce the demand for the use of forums which do not meet the basic requirements of neutrality, accessibility, and transparency.

Comment to “Assuring a Neutral Forum”

Technologically generated alternative dispute resolution (including online dispute resolution) is a rapidly growing field that raises many issues for the justice system. This Principle underlines the importance of applying the basic values and requirements of the justice system and all the Access to Justice Technology Principles to that area, while clarifying that there is no change to governing law.

This Principle is not intended in any way to discourage the accessibility and use of mediation, in which the confidentiality of the proceeding and statements and discussions may assist the parties in reaching a settlement; provided that the parties maintain access to a neutral and transparent forum in the event a settlement is not reached.

5. MAXIMIZING PUBLIC AWARENESS AND USE

Access to justice requires that the public have available understandable information about the justice system, its resources, and means of access. The justice system should promote ongoing public knowledge and understanding of the tools afforded by technology to access justice by developing and disseminating information and materials as broadly as possible in forms and by means that can reach the largest possible number and variety of people.

Comment to “Maximizing Public Awareness and Use”

While assuring public awareness and understanding of relevant access to justice technologies is an affirmative general duty of all governmental branches, this Principle expressly recognizes that the primary responsibility lies with the justice system itself. As stated in the Comment to the Preamble, none of these Access to Justice Technology Principles, including this one, mandates new expenditures or creates new causes of action. At the same time, however, planners and decision makers must demonstrate sensitivity to the needs, capacities, and where appropriate, limitations of prospective users of the justice system.

Communicating the tools of access to the public should be done by whatever means is effective. For example, information about kiosks where domestic violence protection forms can be filled out and filed electronically could be described on radio or television public service announcements. Another example might be providing information on handouts or posters at libraries or community centers. Information could also be posted on a website of the Council for Public Legal Education or of a local or statewide legal aid program, using an audible web reader for persons with visual or literacy limitations. The means may be as many and varied as people’s imaginations and the characteristics of the broad population to be reached.

6. BEST PRACTICES

To ensure implementation of the Access to Justice Technology Principles, those governed by these principles shall utilize “best practices” procedures or standards. Other actors in the justice system are encouraged to utilize or be guided by such best practices procedures or standards.

The best practices shall guide the use of technology so as to protect and enhance access to justice and promote equality of access and fairness. Best practices shall also provide for an effective, regular means of evaluation of the use of technology in light of all the values and objectives of these Principles.

Comment to “Best Practices”

This Principle is intended to provide guidance to ensure that the broad values and approaches articulated elsewhere in these Access to Justice Technology Principles are implemented to the fullest extent possible in the daily reality of the justice system and the people served by the justice system. The intent is that high quality practical tools and resources be available for consideration, use, evaluation, and improvement of technologies in all parts of the justice system. This Principle and these Access to Justice Technology Principles as a whole are intended to encourage progress, innovation, and experimentation with the objective of increasing meaningful access to quality justice for all. With these goals in mind, the development and adoption of statewide models for best practices is strongly encouraged.

APPENDIX 2

Order of the Washington State Supreme Court, Adopting the Access to Justice
Technology Principles

Dated December 3, 2004

THE SUPREME COURT OF WASHINGTON

IN THE MATTER OF THE ACCESS TO JUSTICE
TECHNOLOGY PRINCIPLES

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ORDER

NO. 25700-B- 449

WHEREAS, the Washington judicial system is founded upon the fundamental principle that the judicial system is accessible to all persons; and

WHEREAS, responding to the unmet legal needs of low and moderate income people and others who suffer disparate access barriers or are otherwise vulnerable, and the need for leadership and effective coordination of civil equal justice efforts in Washington State, the Supreme Court established an Access to Justice Board as a permanent body charged with responsibility to assure high quality access for vulnerable and low and moderate income persons and others who suffer disparate access barriers to the civil justice system. The Supreme Court further ordered that, among other responsibilities, the Access to Justice Board shall work to promote, develop and implement policy initiatives which enhance the availability of resources for essential civil equal justice activities, develop and implement new programs and innovative measures designed to expand access to justice in Washington State, and promote the responsiveness of the civil justice system to the needs of those who suffer disparate treatment or disproportionate access barriers; and

WHEREAS, in working to fulfill those responsibilities, the Access to Justice Board recognized that developments in information and communication technologies, including the Internet, pose significant challenges to full and equal access to the justice system, that technology can provide increased pathways for quality access, but it can also perpetuate and exacerbate existing barriers and create significant new barriers. The Board determined it must plan and act proactively to take maximum advantage of the opportunity to destroy or minimize

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ORDER

such barriers and to create more effective and efficient means of access to the justice system and increase the quantity and quality of justice provided to all persons in Washington State; and

WHEREAS, in 2001 the Access to Justice Board empowered and charged a Board committee to engage in a broad-based and inclusive initiative to create a body of authoritative fundamental principles and proposed action based thereon to ensure that current and future technology both increases opportunities and eliminates barriers to access to and effective utilization of the justice system, thereby improving the quality of justice for all persons in Washington State; and

WHEREAS, over a three-year period the Board and committee fulfilled the responsibility of broad and inclusive involvement and the development of "The Access to Justice Technology Principles", with accompanying comments and proposed action based thereon; and The Access to Justice Technology Principles have been endorsed by the Board for Judicial Administration, the Judicial Information System Committee, the Board of Trustees of the Superior Court Judges' Association, the Board of Trustees of the District and Municipal Court Judges' Association, the Board of Governors of the Washington State Bar Association, the Minority and Justice Commission, the Gender and Justice Commission, the Attorney General, and the Council on Public Legal Education; and

WHEREAS, a statewide Judicial Information System to serve the courts of the State of Washington was created by the Supreme Court in 1976 to be operated by the Administrative Office of the Courts pursuant to court rule, and charged with addressing issues of dissemination of data, equipment, communication with other systems, security, and operational priorities; and

ORDER

WHEREAS, consistent with the intent of this Order, pursuant to RCW 2.68.050 the courts of this state, through the Judicial Information System, shall, in pertinent part, promote and facilitate electronic access of judicial information and services to the public at little or no cost and by use of technologies capable of being used by persons without extensive technological ability and wherever possible by persons with disabilities, and;

WHEREAS, the application of the Access to Justice Technology Principles to guide the use of technology in the Washington State justice system is desirable and appropriate; and

WHEREAS, the wide dissemination of the Access to Justice Technology Principles will promote their use and consequent access to justice for all persons;

Now, therefore, it is hereby

ORDERED:

(a) The Access to Justice Technology Principles appended to this Order state the values, standards and intent to guide the use of technology in the Washington State court system and by all other persons, agencies, and bodies under the authority of this Court. These Principles should be considered with other governing law and court rules in deciding the appropriate use of technology in the administration of the courts and the cases that come before such courts, and should be so considered in deciding the appropriate use of technology by all other persons, agencies and bodies under the authority of this Court.

(b) The Access to Justice Technology Principles and this Order shall be published expeditiously with the Washington Court Rules and on the Washington State Bar Association website, and on the courts website as maintained by the Administrative Office of the Courts.

The following introductory language should immediately precede the Access to Justice Technology Principles in all such publications and sites:

"These Access to Justice Technology Principles were developed by the Access to Justice Board to assure that technology enhances rather than diminishes access to and the quality of justice for all persons in Washington State. Comments of the Access to Justice Board committee drafters accompanying the Principles make clear the intent that the Principles are to be used so as to be practical and effective for both the workers in and users of the justice system, that the Principles do not create or constitute the basis for new causes of action or create unfunded mandates. These Principles have been endorsed by the Board for Judicial Administration, the Judicial Information System Committee, the Board of Trustees of the Superior Court Judges' Association, the Board of Trustees of the District and Municipal Court Judges' Association, the Board of Governors of the Washington State Bar Association, the Minority and Justice Commission, the Gender and Justice Commission, the Attorney General, and the Council on Public Legal Education."

(c) The Administrative Office of the Courts in conjunction with the Access to Justice Board and the Judicial Information System Committee shall report annually to the Supreme Court on the use of the Access to Justice Technology Principles in the Washington State court system and by all other persons, agencies, and bodies under the authority of this Court.

DATED at Olympia, Washington this 3rd day of December 2004.



Madison, J.

Ireland, J.



Bridges, J.

Chen, J.

Cowan, J.

Fairhurst, J.
